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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

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KIM SNYDER, on behalf of herself and	)	
all others similarly situated,	)	
	)	
<i>Plaintiff,</i>	)	Case No. 0:21-cv-01049 (JRT/DJF)
	)	
v.	)	
	)	
UNITEDHEALTH GROUP, INC., et al.	)	
	)	
<i>Defendants.</i>	)	
	)	

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**JOINT RESPONSE TO COURT’S FEBRUARY 6, 2024 ORDER  
REGARDING CONTINUED SEALING**

Pursuant to the Court’s February 6, 2024 Order (ECF No. 202), the parties have jointly attached hereto an updated joint sealing chart identifying the Proposed Redaction Exhibits by their ECF number in the “Dkt. No of Redacted Filing” column of the corresponding entry for each document, with highlights in the cells that have been updated. The parties previously met and conferred and reached agreement on the Proposed Redaction Exhibits and summary judgment briefs containing redactions where confidential information is discussed.

Those documents were previously filed at ECF Nos. 198 and 199 (and attachments), but the parties’ joint sealing chart did not contain those new ECF numbers. The joint sealing chart has now been updated to specifically identify the ECF number of each Proposed Redaction Exhibit.

In addition to information and documents designated confidential by the parties to this case, seventy exhibits filed by the parties were designated as confidential by, or on behalf of, third parties to the case by reason of containing proprietary or competitively sensitive information. Of the exhibits designated confidential by third parties, only three are proposed to remain fully under seal because the nature of the document prevents the use of redactions to protect proprietary or competitively sensitive information: Dkt. No. 173-7 (internal memorandum describing corporate relationship, designated by Wells Fargo as confidential and competitively sensitive); Dkt. No. 173-47 (research memorandum designated by Mercer as confidential, propriety, and competitively sensitive); and Dkt. No. 173-42 (presentation containing confidential and competitively sensitive information from third party State Street Global Advisors, previously filed at ECF No. 45-20 and kept under seal pursuant to the Court's prior order at ECF No. 125). After working extensively with the third parties, the parties were able to reach agreement on making the vast majority of the information contained in the third-party documents public. The information that the parties propose redacting, found in the documents filed under the corresponding "Dkt. No. of Redacted Filing" in the updated joint sealing chart, consists of information that the designating third party has represented as proprietary and competitively sensitive information.

The parties respectfully request that the Court grant the joint sealing motion.

Dated: February 27, 2024

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Dkt. No.	Exhibit No.	Dkt. No of Redacted Filing	Nonparty that Designated Document Confidential	Description of Document	Parties' Proposals for Sealing and Unsealing
173	Def. EX. 01	198-3		May 22, 2023 Expert Report of John Chalmers, Ph.D.	The parties agree that the document can be unsealed with minimal redactions. The parties propose to redact non-public confidential information regarding average participant account balances and the amounts and percentages of plan assets invested as of May 2022.
173-1	Def. EX. 02	198-4	Mercer	May 22, 2023 Expert Report of John Minahan, Ph.D., CFA	The parties agree that the document can be unsealed with minimal redactions. The parties propose to redact non-public confidential information regarding average participant account balances and the amounts and percentages of plan assets invested as of May 2022. The parties additionally seek to redact information designated as confidential by third party Mercer regarding proprietary advice it provided to United regarding investment strategies.
173-2	Def. EX. 03	172-1		Excerpts from the January 31, 2023 Ellen Wilson Deposition Transcript	The parties agree that this document may be fully unsealed.
173-3	Def. EX. 04	N/A (Sealed in Full, see Dkt. No. 174)		December 16, 2014 Investment Review Committee Meeting Minutes (UHG_SNYDER_0010393-98)	The parties agree that this document may be fully unsealed.
173-4	Def. EX. 05	N/A (Sealed in Full, see Dkt. No. 174)		February 3, 2016 Written Action of Executive Vice President, Human Capital of UnitedHealth Group Inc. (UHG_SNYDER_0006321-22)	The parties agree that this document may be fully unsealed.
173-5	Def. EX. 06	N/A (Sealed in Full, see Dkt. No. 174)		January 1, 2015 UnitedHealth Group 401(k) Savings Plan Restatement (UHG_SNYDER_0004505-891)	The parties agree that this document may be fully unsealed.
173-6	Def. EX. 07	172-2		Excerpts from the February 21, 2023 Krisann McMahon Deposition Transcript	The parties agree that this document may be fully unsealed.

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173-7	Def. EX. 08	N/A (Sealed in Full, see Dkt. No. 174)	Wells Fargo	Wells Fargo Prep Memo re April 17, 2019 Meeting with UnitedHealth Group (WF-00004239-42)	<p>Third party Wells Fargo represents to the parties that its internal memoranda describing its relationship to United constitute confidential and competitively sensitive business information relevant to the current and ongoing relationship between Wells Fargo and United.</p> <p>Accordingly, the parties agree that this document designated confidential by third party Wells Fargo should remain under seal as it relates to internal business deliberations regarding Wells Fargo's relationship with United.</p>
173-8	Def. EX. 09	N/A (Sealed in Full, see Dkt. No. 174)		Exhibit 7 to January 25, 2023 Monica Kelley Deposition, Fiduciary Training Chart (Kelley_0126)	The parties agree that this document may be fully unsealed.
173-9	Def. EX. 11	172-4		Excerpts from the November 30, 2022 Robert Oberrender Deposition Transcript	The parties agree that this document may be fully unsealed.
173-10	Def. EX. 12	172-5		Excerpts from the November 17, 2022 Thomas McGlinch Deposition Transcript	The parties agree that this document may be fully unsealed.
173-11	Def. EX. 13	N/A (Sealed in Full, see Dkt. No. 174)		January 25, 2016 Email from Andrea Lundahl to Andrea Lundahl, Ellen Wilson, David Strauss, Bruce Monte, Bridget Schulz, Teresa Sebert, Robert Oberrender, Thomas McGlinch, Jason Dehne, Thomas Roos, Krisann McMahon, Jennifer Wachholz, Terri Keimig, Nancy Grant, Lynn Miller, Julie Buske, Amy Adlington, Gary Englert, Kimberly Arnold, Kristen Holovnia, Susan Thoresen, Nicole Schaff, Allison Gmach, and Judith Wethall with Attachment (UHG_SNYDER_0079994-95)	The parties agree that this document may be fully unsealed.

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173-12	Def. EX. 14	N/A (Sealed in Full, see Dkt. No. 174)		June 7, 2018 Email from Susan Thoresen to Amy Adlington, Jonathan Anderson, Jeanine Brattebo, Kelly Bryant, Shawn Eels, Brian Jones, Brent Lingen, Thomas McGlinch, Marte Saiz, Julie Stoll, Shirley Weller, and Cory Hirsch with Attachments (UHG_SNYDER_0079925-27)	The parties agree that this document may be fully unsealed.
173-13	Def. EX. 15	N/A (Sealed in Full, see Dkt. No. 174)		Excerpts from the January 25, 2023 Monica Kelley Deposition Transcript	The parties agree that this document may be fully unsealed.
173-14	Def. EX. 16	172-6		Excerpts from the March 21, 2023 John Rex Deposition Transcript	The parties agree that this document may be fully unsealed.
173-15	Def. EX. 17	172-7		2016 Investment Committee Meeting Minutes (UHG_SNYDER_0000453-77)	The parties agree that this document may be fully unsealed.
173-16	Def. EX. 18	N/A (Sealed in Full, see Dkt. No. 174)		Excerpts from the December 9, 2022 Jason Dehne Deposition Transcript	The parties agree that this document may be fully unsealed.
173-17	Def. EX. 19	N/A (Sealed in Full, see Dkt. No. 174)		Excerpts from the January 12, 2023 Kelly Bryant Deposition Transcript	The parties agree that this document may be fully unsealed.
173-18	Def. EX. 21	172-9		Excerpts from the February 15, 2023 Jaime Erickson Deposition Transcript	The parties agree that this document may be fully unsealed.
173-19	Def. EX. 22	198-5	Mercer	April 26, 2017 Mercer Target Date Fund Analysis Presentation (UHG_SNYDER_0036687-735)	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
173-20	Def. EX. 23	198-6		June 21, 2017 Target Date Fund Selection (UHG_SNYDER_0043793)	The parties agree that this document may be partially unsealed, with minimal redactions for confidential information regarding the demographics of United employees participating in its 401(k) plan.

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173-21	Def. EX. 24	N/A (Sealed in Full, see Dkt. No. 174)		August 31, 2017 Email from Jaime Erickson to Ellen Wilson, David Strauss, John Rex, Robert Oberrender, and Thomas McGlinch with Attachment (UHG_SNYDER_0003938-42)	The parties agree that this document may be fully unsealed.
173-22	Def. EX. 25	198-7	Mercer	Excerpts from the March 29, 2023 Devon Muir Deposition Transcript	The parties agree that this transcript may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
173-23	Def. EX. 26	198-8		Excerpts from the July 20, 2023 Donald Stone Deposition Transcript	The parties agree that this transcript may be partially unsealed, with modest redactions for confidential financial information regarding United's business relationships.
173-24	Def. EX. 27	N/A (Sealed in Full, see Dkt. No. 174)		May 15, 2017 Email from Thomas McGlinch to Philip Suess (UHG_SNYDER_0084549)	The parties agree that this document may be fully unsealed.
173-25	Def. EX. 28	N/A (Sealed in Full, see Dkt. No. 174)		May 17, 2017 Email from Thomas McGlinch to Philip Suess (UHG_SNYDER_0037278-80)	The parties agree that this document may be fully unsealed.
173-26	Def. EX. 29	N/A (Sealed in Full, see Dkt. No. 174)		May 19, 2017 Email from Donna Kujat to Thomas McGlinch with Attachment (UHG_SNYDER_0043495-97)	The parties agree that this document may be fully unsealed.
173-27	Def. EX. 30	N/A (Sealed in Full, see Dkt. No. 174)		May 30, 2017 Email from Thomas McGlinch to Philip Suess (UHG_SNYDER_0037334-35)	The parties agree that this document may be fully unsealed.
173-28	Def. EX. 31	N/A (Sealed in Full, see Dkt. No. 174)		May 31, 2017 Email from Thomas McGlinch to Philip Suess with Attachment (UHG_SNYDER_0043758-60)	The parties agree that this document may be fully unsealed.
173-29	Def. EX. 32	N/A (Sealed in Full, see Dkt. No. 174)		May 31, 2017 Email from Philip Suess to Thomas McGlinch (UHG_SNYDER_0043755-57)	The parties agree that this document may be fully unsealed.
173-30	Def. EX. 33	N/A (Sealed in Full, see Dkt. No. 174)		June 13, 2017 Email from Thomas McGlinch to Philip Suess (UHG_SNYDER_0037354-55)	The parties agree that this document may be fully unsealed.



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173-31	Def. EX. 34	N/A (Sealed in Full, see Dkt. No. 174)		June 14, 2017 Email from Donna Kujat to Thomas McGlinch with Attachment (UHG_SNYDER_0037362-64)	The parties agree that this document may be fully unsealed.
173-32	Def. EX. 35	N/A (Sealed in Full, see Dkt. No. 174)		June 12, 2017 Email from Philip Suess to Thomas McGlinch with Attachment (UHG_SNYDER_0043764-79)	The parties agree that this document may be fully unsealed.
173-33	Def. EX. 36	198-9		June 20, 2017 Email from Philip Suess to Thomas McGlinch with Attachment (UHG_SNYDER_0043801-05)	The parties agree that this document may be partially unsealed, with minimal redactions for confidential information regarding the demographics of United employees participating in its 401(k) plan.
173-34	Def. EX. 37	198-10	Mercer	Excerpts from the April 27, 2023 Philip Suess Deposition Transcript	The parties agree that this transcript may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
173-35	Def. EX. 39	N/A (Sealed in Full, see Dkt. No. 174)		June 27, 2016 Email from Kristi Mitchem to Thomas McGlinch and Robert Oberrender (UHG_SNYDER_0082799-800)	The parties agree that this document may be fully unsealed.
173-36	Def. EX. 40	172-11		Excerpts from the February 24, 2023 Bruce Monte Deposition Transcript	The parties agree that this transcript may be fully unsealed.
173-37	Def. EX. 41	172-12		Excerpts from the March 17, 2023 David Strauss Deposition Transcript	The parties agree that this transcript may be fully unsealed.
173-38	Def. EX. 42	198-11	Mercer	October 3, 2014 Memo from Philip Suess to Jason Dehne, Robert Oberrender, and Thomas McGlinch (UHG_SNYDER_0009840-42)	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
173-39	Def. EX. 43	198-12	Mercer	April 27, 2015 Email from Jason Dehne to Thomas McGlinch, Bruce Monte, Robert Oberrender, and David Strauss with Attachments (UHG_SNYDER_0047866-73)	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding its analytical approach to investment recommendations.

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173-40	Def. EX. 44	198-13	Mercer	December 2015 Mercer Presentation (UHG_SNYDER_0052841-904)	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
173-41	Def. EX. 45	N/A (Sealed in Full, see Dkt. No. 174)		December 11, 2015 Investment Review Committee Meeting Agenda (UHG_SNYDER_0012367)	The parties agree that this document may be fully unsealed.
173-42	Def. EX. 48	N/A (Sealed in Full, see Dkt. No. 174)	State Street Global Advisors	February 25, 2016 State Street Global Advisors Presentation (UHG_SNYDER_0003316-85)	The parties agree that this document containing confidential information from third party State Street Global Advisors, previously filed at ECF No. 45-20, may remain sealed pursuant to the Court's prior order at ECF No. 125.
173-43	Def. EX. 51	198-14	Mercer	May 30, 2016 Email from Jason Dehne to Thomas McGlinch, Krisann McMahon, Bruce Monte, Robert Oberrender, and David Strauss with Attachments (UHG_SNYDER_0031609-2084)	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
173-44	Def. EX. 52	N/A (Sealed in Full, see Dkt. No. 174)		October 11, 2016 Email from Bruce Monte to David Strauss (UHG_SNYDER_0076683-84)	The parties agree that this document may be fully unsealed.
173-45	Def. EX. 53	N/A (Sealed in Full, see Dkt. No. 174)		October 11, 2016 Email from David Strauss to Bruce Monte (UHG_SNYDER_0076685-86)	The parties agree that this document may be fully unsealed.
173-46	Def. EX. 54	N/A (Sealed in Full, see Dkt. No. 174)		January 10, 2017 Email from Jaime Erickson to David Strauss (UHG_SNYDER_0076687-88)	The parties agree that this document may be fully unsealed.

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173-47	Def. EX. 55	N/A (Sealed in Full, see Dkt. No. 174)	Mercer	August 9, 2016 Research View re Analytic Investors (UHG_SNYDER_0081504-08)	Third party Mercer represents to the parties that its research summaries prepared regarding the attributes of investment offerings constitute confidential and competitively sensitive business information.  Accordingly, the parties agree that this document designated confidential by third party Mercer should remain under seal as this document is a proprietary investment research summary.
173-48	Def. EX. 58	N/A (Sealed in Full, see Dkt. No. 174)		March 30, 2017 Letter from Philip Suess to David Algaze (UHG_SNYDER_0035525-26)	The parties agree that this document may be fully unsealed.
173-49	Def. EX. 59	172-19		Excerpts from the November 18, 2022 Thomas McGlinch Deposition Transcript	The parties agree that this transcript may be fully unsealed.
173-50	Def. EX. 60	198-15		May 8, 2017 Email from Robert Oberrender to Felecia Lockett with Attachments (UHG_SNYDER_0052584-99)	The parties agree that this document may be partially unsealed, with minimal redactions for confidential information regarding the demographics of United employees participating in its 401(k) plan.
173-51	Def. EX. 61	N/A (Sealed in Full, see Dkt. No. 174)		June 23, 2017 Talking Points for Discussions with Target Date Fund Bidders (UHG_SNYDER_0040717-18)	The parties agree that this document may be fully unsealed.
173-52	Def. EX. 62	N/A (Sealed in Full, see Dkt. No. 174)		May 1, 2017 Email from Kristi Mitchem to Robert Oberrender and Thomas McGlinch with Attachments (UHG_SNYDER_0043442-52)	The parties agree that this document may be fully unsealed.
173-53	Def. EX. 63	N/A (Sealed in Full, see Dkt. No. 174)		May 2, 2017 Email from Jaime Erickson to Thomas McGlinch (UHG_SNYDER_0036885-86)	The parties agree that this document may be fully unsealed.
173-54	Def. EX. 64	N/A (Sealed in Full, see Dkt. No. 174)		May 10, 2017 Email from Thomas McGlinch to Robert Oberrender, David Strauss, Jaime Erickson, and Debra Berns (UHG_SNYDER_0043489)	The parties agree that this document may be fully unsealed.

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173-55	Def. EX. 65	N/A (Sealed in Full, see Dkt. No. 174)		May 15, 2017 Email from Thomas McGlinch to Jeffrey Johnson (UHG_SNYDER_0037271)	The parties agree that this document may be fully unsealed.
173-56	Def. EX. 66	198-16	Wells Fargo	May 17, 2017 Email from Jaime Erickson to Jeffrey Johnson, Thomas McGlinch, Robert Oberrender, Kristi Mitchem, Christian Chan, Nicolaas Marais, Peter Syslack, Kristy Mercurio, and Ryan Shelby with Attachment (WF-00018629-33)	The parties agree that the cover email to this document may be unsealed and that the attachment should be fully redacted because it contains confidential information regarding the demographics of United employees participating in its 401(k) plan.
173-57	Def. EX. 67	N/A (Sealed in Full, see Dkt. No. 174)		May 18, 2017 Email from Jeffrey Johnson to Thomas McGlinch with Attachments (UHG_SNYDER_0037300-03)	The parties agree that this document may be fully unsealed.
173-58	Def. EX. 68	198-17	Wells Fargo	May 19, 2017 Email from Thomas McGlinch to Jeffery Johnson (WF-00018790-91)	The parties agree that this document may be partially unsealed, with minimal redactions for confidential information regarding the demographics of United employees participating in its 401(k) plan.
173-59	Def. EX. 69	198-18		May 22, 2017 Email from Jeffrey Johnson to Thomas McGlinch, Jaime Erickson, and Robert Oberrender with Attachment (UHG_SNYDER_0043598-99)	The parties agree that this document may be partially unsealed, with minimal redactions for confidential information regarding the demographics of United employees participating in its 401(k) plan.
173-60	Def. EX. 70	N/A (Sealed in Full, see Dkt. No. 174)		May 26, 2017 Email from Ryan Shelby to Thomas McGlinch and Jaime Erickson (UHG_SNYDER_0043680-88)	The parties agree that this document may be fully unsealed.
173-61	Def. EX. 71	N/A (Sealed in Full, see Dkt. No. 174)		May 9, 2017 Email from Jaime Erickson to Jeffrey Johnson, Robert Oberrender, and Thomas McGlinch (UHG_SNYDER_0037245-46)	The parties agree that this document may be fully unsealed.
173-62	Def. EX. 72	N/A (Sealed in Full, see Dkt. No. 174)		May 22, 2017 Email from Thomas McGlinch to Robert Oberrender (UHG_SNYDER_0043602-03)	The parties agree that this document may be fully unsealed.
173-63	Def. EX. 73	N/A (Sealed in Full, see Dkt. No. 174)		May 11, 2017 Email from Thomas McGlinch to Jaime Erickson (UHG_SNYDER_0043490)	The parties agree that this document may be fully unsealed.

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173-64	Def. EX. 74	N/A (Sealed in Full, see Dkt. No. 174)		May 27, 2017 Email from Jaime Erickson to Ellen Wilson, John Rex, David Strauss, Robert Oberrender, Thomas McGlinch, and Debra Berns with Attachments (UHG_SNYDER_0037311-16)	The parties agree that this document may be fully unsealed.
173-65	Def. EX. 75	N/A (Sealed in Full, see Dkt. No. 174)		August 6, 2021 Investment Committee Meeting Minutes (UHG_SNYDER_0023210-11)	The parties agree that this document may be fully unsealed.
173-66	Def. EX. 76	N/A (Sealed in Full, see Dkt. No. 174)		Spreadsheet re Q4 2014 Wells Fargo (UHG_SNYDER_0076678)	United's internal memoranda describing its relationship with Wells Fargo constitute confidential and competitively sensitive business information relevant to the current and ongoing relationship between Wells Fargo and United.  Accordingly, the parties agree that this document should remain sealed in full because it contains confidential and sensitive information reflecting United's internal assessment of its business relationship with Wells Fargo.
173-67	Def. EX. 77	N/A (Sealed in Full, see Dkt. No. 174)		February 18, 2015 Investment Review Committee Meeting Minutes (UHG_SNYDER_0010808-12)	The parties agree that this document may be fully unsealed.
173-68	Def. EX. 78	N/A (Sealed in Full, see Dkt. No. 174)		May 20, 2015 Investment Review Committee Meeting Minutes (UHG_SNYDER_0011306-10)	The parties agree that this document may be fully unsealed.
173-69	Def. EX. 79	N/A (Sealed in Full, see Dkt. No. 174)		August 20, 2015 Investment Review Committee Meeting Minutes (UHG_SNYDER_0000445-48)	The parties agree that this document may be fully unsealed.
173-70	Def. EX. 80	N/A (Sealed in Full, see Dkt. No. 174)		November 12, 2015 Investment Review Committee Meeting Minutes (UHG_SNYDER_0000449-52)	The parties agree that this document may be fully unsealed.
173-71	Def. EX. 81	N/A (Sealed in Full, see Dkt. No. 174)		November 15, 2016 Email from Thomas McGlinch to Robert Oberrender (UHG_SNYDER_0042861-62)	The parties agree that this document may be fully unsealed.
173-72	Def. EX. 82	N/A (Sealed in Full, see Dkt. No. 174)		November 20, 2016 Email from Thomas McGlinch to Robert Oberrender (UHG_SNYDER_0028590-92)	The parties agree that this document may be fully unsealed.

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173-73	Def. EX. 83	N/A (Sealed in Full, see Dkt. No. 174)		January 1, 2012 UnitedHealth Group 401(k) Savings Plan Investment Policy Statement (UHG_SNYDER_0005481-504)	The parties agree that this document may be fully unsealed.
173-74	Def. EX. 84	N/A (Sealed in Full, see Dkt. No. 174)		November 18, 2016 Email from Thomas McGlinch to Shawn Eels, Michael Jonczyk, Rebecca Reed (UHG_SNYDER_0033473)	The parties agree that this document may be fully unsealed.
173-75	Def. EX. 85	N/A (Sealed in Full, see Dkt. No. 174)		Spreadsheet re Q2 2015 JPMorgan Chase Bank (UHG_SNYDER_0083959)	United's internal memoranda describing its relationship with Wells Fargo constitute confidential and competitively sensitive business information relevant to the current and ongoing relationship between JP Morgan and United.  Accordingly, the parties agree that this document should remain sealed in full because it reflects confidential and sensitive information reflecting United's internal assessment of its business relationship with JP Morgan.
173-76	Def. EX. 86	N/A (Sealed in Full, see Dkt. No. 174)		Spreadsheet re Q2 2016 JPMorgan Chase Bank (UHG_SNYDER_0083963)	United's internal memoranda describing its relationship with Wells Fargo constitute confidential and competitively sensitive business information relevant to the current and ongoing relationship between JP Morgan and United.  Accordingly, the parties agree that this document should remain sealed in full because it reflects confidential and sensitive information reflecting United's internal assessment of its business relationship with JP Morgan.
173-77	Def. EX. 87	198-19		November 18, 2016 Email from Denise Terry to Robert Oberrender, Thomas McGlinch, Rebecca Reed, and Brent Lingen with Attachment (UHG_SNYDER_0076480-81)	The parties agree that the cover email to this document may be unsealed and that the attachment to this document should be redacted in full because it contains confidential financial information regarding United's business relationships.
173-78	Def. EX. 90	198-20	Mercer	1Q 2016 Mercer Presentation (UHG_SNYDER_0001018-184)	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.

Dkt. No.	Exhibit No.	Dkt. No of Redacted Filing	Nonparty that Designated Document Confidential	Description of Document	Parties' Proposals for Sealing and Unsealing
173-79	Def. EX. 91	N/A (Sealed in Full, see Dkt. No. 174)		January 1, 2019 UnitedHealth Group 401(k) Savings Plan Restatement (UHG_SNYDER_0004974-5400)	The parties agree that this document may be fully unsealed.
179-1	Pl. Ex. 1	199-1		Initial Expert Report of Donald Stone, dated May 22, 2023	The parties agree that the document may be partially unsealed with minimal redactions. The parties propose to redact confidential financial information regarding United's business relationships. The parties additionally seek to redact information designated as confidential by Mercer regarding proprietary advice it provided to United regarding investment strategies.
179-2	Pl. Ex. 2	199-2	Mercer	Expert Rebuttal Report of Donald Stone, dated June 19, 2023	The parties agree that the document can be partially unsealed, with minimal redactions for information designated as confidential by Mercer regarding proprietary advice it provided to United regarding investment strategies.
179-3	Pl. Ex. 3	199-3	Mercer	Initial Expert Report of David J. Witz, dated May 22, 2023	The parties agree that the document can be partially unsealed, with minimal redactions for information designated as confidential by Mercer regarding proprietary advice it provided to United regarding investment strategies.
179-4	Pl. Ex. 4	199-4	Mercer	Expert Rebuttal Report of David J. Witz, dated June 19, 2023	The parties agree that the document can be partially unsealed, with minimal redactions for information designated as confidential by Mercer regarding proprietary advice it provided to United regarding investment strategies.
179-5	Pl. Ex. 5	N/A (Sealed in Full, see Dkt. No. 183)		Chart of Wells Fargo Target Fund Suite Performance Compared to Peer Universe	The parties agree that the document may be fully unsealed. Mercer has agreed to unseal the data from Plaintiff's Exhibits 12-20 that is represented in this chart.
179-6	Pl. Ex. 7	N/A (Sealed in Full, see Dkt. No. 183)		UnitedHealth Group 401(k) Savings Plan Investment Policy Statement dated January 1, 2012, as produced by Defendants at UHG_SNYDER_0005481-UHG_SNYDER_0005504.	The parties agree that this document may be fully unsealed.

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179-7	Pl. Ex. 8	N/A (Sealed in Full, see Dkt. No. 183)		UnitedHealth Group 401(k) Savings Plan Investment Policy Statement dated May 30, 2018, as produced by Defendants at UHG_SNYDER_0005505-13.	The parties agree that this document may be fully unsealed.
179-8	Pl. Ex. 9	N/A (Sealed in Full, see Dkt. No. 183)		UnitedHealth Group 401(k) Savings Plan Investment Policy Statement dated December 18, 2019, as produced by Defendants at UHG_SNYDER_0005514-22.	The parties agree that this document may be fully unsealed.
179-9	Pl. Ex. 10	N/A (Sealed in Full, see Dkt. No. 183)		UnitedHealth Group 401(k) Savings Plan Investment Policy Statement dated December 17, 2020, as produced by Defendants at UHG_SNYDER_0005472-80.	The parties agree that this document may be fully unsealed.
179-10	Pl. Ex. 11	199-5	Mercer	Excerpts from Mercer's quarterly performance report for 2012 Q4, as produced by Defendants at UHG_SNYDER_0006440, UHG_SNYDER_0006442, UHG_SNYDER_0006456-85.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-11	Pl. Ex. 12	199-6	Mercer	Excerpts from Mercer's quarterly performance reports for 2013, as produced by Defendants at UHG_SNYDER_0007083, UHG_SNYDER_0007085, UHG_SNYDER_0007103-29, UHG_SNYDER_0007474, UHG_SNYDER_0007476, UHG_SNYDER_0007494-521, UHG_SNYDER_0007885, UHG_SNYDER_0007887, UHG_SNYDER_0007905-48, UHG_SNYDER_0008353, UHG_SNYDER_0008355, UHG_SNYDER_0008369-407.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.



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179-12	Pl. Ex. 13	199-7	Mercer	Excerpts from Mercer's quarterly performance reports for 2014, as produced by Defendants at UHG_SNYDER_0008850, UHG_SNYDER_0008852, UHG_SNYDER_0008870-901, UHG_SNYDER_0009578-79, UHG_SNYDER_0009595-636, UHG_SNYDER_0009854-55, UHG_SNYDER_0009871-904, UHG_SNYDER_0010661-62, UHG_SNYDER_0010678-704	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-13	Pl. Ex. 14	199-8	Mercer	Excerpts from Mercer's quarterly performance reports for 2015, as produced by Defendants at UHG_SNYDER_0010900-01, UHG_SNYDER_0010915-49, UHG_SNYDER_0011324-25, UHG_SNYDER_0011339-77, UHG_SNYDER_0012219-20, UHG_SNYDER_0012234-66, UHG_SNYDER_0012830-31, UHG_SNYDER_0012846-77	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-14	Pl. Ex. 15	199-9	Mercer	Excerpts from Mercer's quarterly performance reports for 2016, as produced by Defendants at UHG_SNYDER_0014046-47, UHG_SNYDER_0014061-93, UHG_SNYDER_0001185, UHG_SNYDER_0001187, UHG_SNYDER_0001203-35, UHG_SNYDER_0014258-59, UHG_SNYDER_0014273-309, UHG_SNYDER_0014886-87, UHG_SNYDER_0014901-30.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.

Dkt. No.	Exhibit No.	Dkt. No of Redacted Filing	Nonparty that Designated Document Confidential	Description of Document	Parties' Proposals for Sealing and Unsealing
179-15	Pl. Ex. 16	199-10	Mercer	Excerpts from Mercer's quarterly performance reports for 2017, as produced by Defendants UHG_SNYDER_0001700-17, UHG_SNYDER_0015329-47, UHG_SNYDER_0015523-24, UHG_SNYDER_0015536-62, UHG_SNYDER_0015753-54, UHG_SNYDER_0015766-97.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-16	Pl. Ex. 17	199-11	Mercer	Excerpts from Mercer's quarterly performance reports for 2018, as produced by Defendants UHG_SNYDER_0015963-64, UHG_SNYDER_0015978-91, UHG_SNYDER_0016203-18, UHG_SNYDER_0017022-39, UHG_SNYDER_0017549-69.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-17	Pl. Ex. 18	199-12	Mercer	Excerpts from Mercer's quarterly performance reports for 2019, as produced by Defendants at UHG_SNYDER_0017913-33, UHG_SNYDER_0018150-74, UHG_SNYDER_0018190-222, UHG_SNYDER_0018432-63, UHG_SNYDER_0018481-519, UHG_SNYDER_0018754-877.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-18	Pl. Ex. 19	199-13	Mercer	Excerpts from Mercer's quarterly performance reports for 2020, as produced by Defendants at UHG_SNYDER_0019051-52, UHG_SNYDER_0019058-75, UHG_SNYDER_0019421-22, UHG_SNYDER_0019427-44, UHG_SNYDER_0019896-97, UHG_SNYDER_0019903-20, UHG_SNYDER_0021127-28, UHG_SNYDER_0021134-51.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.

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179-19	Pl. Ex. 20	199-14	Mercer	Excerpts from Mercer's quarterly performance reports for 2021, as produced by Defendants at UHG_SNYDER_0022237-38, UHG_SNYDER_0022243-60, UHG_SNYDER_0023213-14, UHG_SNYDER_0023219-36, UHG_SNYDER_0023843-44, UHG_SNYDER_0023850-67, UHG_SNYDER_0076185-86, UHG_SNYDER_0076192-209.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-20	Pl. Ex. 21	N/A (Sealed in Full, see Dkt. No. 183)		UnitedHealth Group 401(k) Savings Plan Participant Disclosure Notices dated from 2015 to 2021, as produced by Defendants at UHG_SNYDER_0002619-33, UHG_SNYDER_0002634-46, UHG_SNYDER_0002647-59, UHG_SNYDER_0002660-72, UHG_SNYDER_0002673-85, UHG_SNYDER_0002686-98, UHG_SNYDER_0002699-711, UHG_SNYDER_0002712-23, UHG_SNYDER_0050302-14, UHG_SNYDER_0066673-86, UHG_SNYDER_0002724-37, UHG_SNYDER_0066710-22, and UHG_SNYDER_0002738-50.	The parties agree that this document may be fully unsealed.
179-21	Pl. Ex. 25	199-15	Mercer	Mercer presentation entitled "UnitedHealth Group [/] Target Date Fund Discussion," dated December 17, 2020, as produced by Defendants at UHG_SNYDER_0076564-655.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-22	Pl. Ex. 26	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence with attachments bearing the subject line "Target Date Fund Communications," and dated September 18, 2017, as produced by Defendants at UHG_SNYDER_0040331-51.	The parties agree that this document may be fully unsealed.

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179-23	Pl. Ex. 27	N/A (Sealed in Full, see Dkt. No. 183)		Agreement for Investment in the Wells Fargo Bank, N.A. Collective Investment Funds for Retirement Plans dated April 17, 2015, as produced by Defendants at UHG_SNYDER_0025455-57.	The parties agree that this document may be fully unsealed.
179-24	Pl. Ex. 28	N/A (Sealed in Full, see Dkt. No. 183)		Agreement for Investment in the Wells Fargo Bank, N.A. Collective Investment Funds for Retirement Plans, dated October 27, 2017, as produced by Defendants at UHG_SNYDER_0025464-71.	The parties agree that this document may be fully unsealed.
179-25	Pl. Ex. 29	199-16	Mercer	Chart Showing Mercer Analysis of Projected Plan Participant Outcomes for Wells Fargo Target Fund Suite versus Comparator Funds.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-26	Pl. Ex. 30	199-17	Mercer	Mercer memorandum bearing the subject line "October 6, 2014, Investment Committee Meeting," dated October 3, 2014, as produced by Defendants at UHG_SNYDER_0009840-42.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-27	Pl. Ex. 31	199-18	Mercer	Mercer presentation entitled "UnitedHealth Group Target Date Fund Analysis," dated August 20, 2015, as produced by Defendants at UHG_SNYDER_0002751-95.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-28	Pl. Ex. 32	199-19	Mercer	Mercer presentation entitled "UnitedHealth Group [/] Target Date Fund Discussion," dated December 2015, as produced by Defendants at UHG_SNYDER_0002810-73.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-29	Pl. Ex. 33	199-20	Mercer	Mercer presentation entitled "UnitedHealth Group [/] Target Date Fund Discussion," dated December 2015, as produced by Defendants at UHG_SNYDER_0002891-964.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.

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179-30	Pl. Ex. 34	199-21	Mercer	Mercer presentation entitled "UnitedHealth Group [/] Summary of Target Date Fund Presentations," dated June 2016, as produced by Defendants at UHG_SNYDER_0002967-3074.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-31	Pl. Ex. 35	199-22	Mercer	Email correspondence with attachment bearing the subject line "Investment Committee Meeting," dated July 26, 2016, as produced by Defendants at UHG_SNYDER_0032972-92.	The parties agree that this document may be partially unsealed, with minimal redactions for personal identifying information.
179-32	Pl. Ex. 36	199-23	Mercer	Mercer presentation entitled "Target Date Fund Analysis," dated April 26, 2017, as produced by Defendants at UHG_SNYDER_0003150-98.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-33	Pl. Ex. 37	199-24		Email correspondence with attachment bearing the subject line "Finalize Target Date Fund Firm," dated June 20, 2017, as produced by Defendants at UHG_SNYDER_0043792-93.	The parties agree that this document may be partially unsealed, with minimal redactions for confidential information regarding the demographics of United employees participating in its 401(k) plan.
179-34	Pl. Ex. 39	N/A (Sealed in Full, see Dkt. No. 183)		Mercer presentation entitled "Investment Manager Concentration Review," dated September 1, 2021, as produced by Defendants at UHG_SNYDER_0059955-64.	The parties and Mercer agree that this document may be fully unsealed.
179-35	Pl. Ex. 40	199-25	Mercer	Excerpts from the deposition of Devon Muir (testifying as a Rule 30(b)(6) witness on behalf of Mercer Investment Consulting, Inc.), taken on March 29, 2023.	The parties agree that this transcript may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-36	Pl. Ex. 41	178-5		Excerpts from the deposition of Thomas McGlinch (testifying as a Rule 30(b)(6) witness on behalf of UnitedHealth Group, Investment Committee, and Investment Sub-Committee), taken on November 17 and 18, 2022.	The parties agree that this transcript may be fully unsealed.

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179-37	Pl. Ex. 42	N/A (Sealed in Full, see Dkt. No. 183)		Excerpts from the deposition of Monica Kelley (testifying as a Rule 30(b)(6) witness on behalf of UnitedHealth Group, Investment Committee, and Investment Sub-Committee), taken on January 25, 2023.	The parties agree that this transcript may be fully unsealed.
179-38	Pl. Ex. 43	178-6		Excerpts from the deposition of Ellen Wilson, taken on January 31, 2023.	The parties agree that this transcript may be fully unsealed.
179-39	Pl. Ex. 44	199-26		Excerpts from the deposition of Robert Oberrender, taken on November 30, 2022	The parties agree that this transcript may be partially unsealed, with minimal redactions for confidential financial information regarding United's business relationship with Wells Fargo.
179-40	Pl. Ex. 45	178-8		Excerpts from the deposition of Jaime Erickson, taken on February 15, 2023.	The parties agree that this transcript may be fully unsealed.
179-41	Pl. Ex. 46	N/A (Sealed in Full, see Dkt. No. 183)		Excerpts from the deposition of Peter Gill, taken on January 18, 2023.	The parties agree that this transcript may be fully unsealed.
179-42	Pl. Ex. 47	N/A (Sealed in Full, see Dkt. No. 183)		Excerpts from the deposition of Bruce Monte, taken on February 24, 2023.	The parties agree that this transcript may be fully unsealed.
179-43	Pl. Ex. 48	N/A (Sealed in Full, see Dkt. No. 183)		Excerpts from the deposition of Defendant John Rex, taken on March 21, 2023, with corresponding errata.	The parties agree that this transcript may be fully unsealed.
179-44	Pl. Ex. 49	199-27	Mercer	Excerpts from the deposition of Philip J. Suess, taken on April 27, 2023.	The parties agree that this transcript may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-45	Pl. Ex. 50	N/A (Sealed in Full, see Dkt. No. 183)		Excerpts from the deposition of Kelly Bryant (testifying as a Rule 30(b)(6) witness on behalf of UnitedHealth Group, Investment Committee, and Investment Sub-Committee), taken on January 12, 2023.	The parties agree that this transcript may be fully unsealed.

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179-46	Pl. Ex. 52	N/A (Sealed in Full, see Dkt. No. 183)		Excerpts from the deposition of David Strauss, taken on March 17, 2023.	The parties agree that this transcript may be fully unsealed.
179-47	Pl. Ex. 54	N/A (Sealed in Full, see Dkt. No. 183)		Investment Review Committee meeting minutes for 2014, as produced by Defendants at UHG_SNYDER_0008843-48, UHG_SNYDER_0009338-49, UHG_SNYDER_0010393-98.	The parties agree that this document may be fully unsealed.
179-48	Pl. Ex. 55	N/A (Sealed in Full, see Dkt. No. 183)		Investment Review Committee meeting minutes for 2015, as produced by Defendants at UHG_SNYDER_0010824-28, UHG_SNYDER_0000440-52.	The parties agree that this document may be fully unsealed.
179-49	Pl. Ex. 56	N/A (Sealed in Full, see Dkt. No. 183)		Investment Committee meeting minutes for 2016, as produced by Defendants at UHG_SNYDER_0000453-UHG_SNYDER_0000477.	The parties agree that this document may be fully unsealed.
179-50	Pl. Ex. 57	N/A (Sealed in Full, see Dkt. No. 183)		Investment Committee meeting minutes for 2017, as produced by Defendants at UHG_SNYDER_0000478-UHG_SNYDER_0000491.	The parties agree that this document may be fully unsealed.
179-51	Pl. Ex. 58	N/A (Sealed in Full, see Dkt. No. 183)		Investment Committee and Investment Sub-Committee meeting minutes for 2018, as produced by Defendants at UHG_SNYDER_0000492-506, UHG_SNYDER_0000535-44, UHG_SNYDER_0000507-510.	The parties agree that this document may be fully unsealed.

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179-52	Pl. Ex. 59	N/A (Sealed in Full, see Dkt. No. 183)		Investment Committee and Investment Sub-Committee meeting minutes for 2019, as produced by Defendants at UHG_SNYDER_0000545-46, UHG_SNYDER_0000511-13, UHG_SNYDER_0000547-48, UHG_SNYDER_0000514-16, UHG_SNYDER_0000549-51, UHG_SNYDER_0000517-19, UHG_SNYDER_0000552-54, UHG_SNYDER_0000520-22.	The parties agree that this document may be fully unsealed.
179-53	Pl. Ex. 60	N/A (Sealed in Full, see Dkt. No. 183)		Investment Committee and Investment Sub-Committee meeting minutes for 2020, as produced by Defendants at UHG_SNYDER_0000555-57, UHG_SNYDER_0000523-25, UHG_SNYDER_0000558-62, UHG_SNYDER_0000526-28, UHG_SNYDER_0000563-67, UHG_SNYDER_0000529-31, UHG_SNYDER_0000568-70, UHG_SNYDER_0000532-34.	The parties agree that this document may be fully unsealed.
179-54	Pl. Ex. 61	N/A (Sealed in Full, see Dkt. No. 183)		Investment Committee and Investment Sub-Committee meeting minutes for 2021, as produced by Defendants at UHG_SNYDER_0000571-72, UHG_SNYDER_0022217-18, UHG_SNYDER_0000573-76, UHG_SNYDER_0023060-63, UHG_SNYDER_0023204-07, UHG_SNYDER_0023064-68, UHG_SNYDER_0023208-11, UHG_SNYDER_0023069, UHG_SNYDER_0023922-25, UHG_SNYDER_0023791-93, UHG_SNYDER_0023926, UHG_SNYDER_0023794-95.	The parties agree that this document may be fully unsealed.



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179-55	Pl. Ex. 62	199-28	Mercer	Mercer presentation entitled "UnitedHealth Group [/] Target Date Fund Alternatives," dated March 3, 2021, as produced by Defendants at UHG_SNYDER_0004323-68.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-56	Pl. Ex. 63	199-29	Mercer	Mercer presentation entitled "UnitedHealth Group [/] Target Date Fund Alternatives [/] Recommendation of the Sub-Committee," dated March 16, 2021, as produced by Defendants at UHG_SNYDER_0004369-94.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-57	Pl. Ex. 64	199-30	Mercer	Mercer presentation entitled "Target Date Funds Alternatives," dated May 17, 2021, as produced by Defendants at UHG_SNYDER_0021280-349.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-58	Pl. Ex. 65	199-31	Mercer	Mercer presentation entitled "Target Date Funds Alternatives [/] Decision Guide - a supplement," dated June 2, 2021, as produced by Defendants at UHG_SNYDER_0025915-25946.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-59	Pl. Ex. 66	199-32	Mercer	Mercer presentation entitled "Target Date Funds Evaluation Update," dated June 21, 2021, as produced by Defendants at UHG_SNYDER_0063133-43.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-60	Pl. Ex. 67	199-33	Mercer	Mercer presentation entitled "Target Date Fund Manager Evaluation," dated July 30, 2021, as produced by Defendants at UHG_SNYDER_0027683-751.	The parties agree that this transcript may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-61	Pl. Ex. 68	199-34	Mercer	Mercer presentation entitled "Target Date Fund Manager Evaluation," dated August 6, 2021, as produced by Defendants at UHG_SNYDER_0022966-75.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.

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179-62	Pl. Ex. 69	199-35	Mercer	"UnitedHealthCare Services, Inc. [/] Statement of Work ("SOW") [/] Manager Evaluation Work [/] Lifecycle Funds," dated May 26, 2015, as produced by Defendants at UHG_SNYDER_0025362-64.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
179-63	Pl. Ex. 70	N/A (Sealed in Full, see Dkt. No. 183)		Defendants' Objections and Responses to Plaintiff's Second Set of Interrogatories, dated July 15, 2022	The parties agree that this document may be fully unsealed.
179-64	Pl. Ex. 71	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence with attachment bearing the subject line "Target Date Fund Process and Decisions," and dated August 31, 2017, as produced by Defendants at 0003938-42.	The parties agree that this document may be fully unsealed.
179-65	Pl. Ex. 72	199-36		Email correspondence with attachment bearing the subject line "Target Date Fund Scorecard," dated June 24, 2016, as produced by Defendants at UHG_SNYDER_0042714-15.	The parties agree that this document may be partially unsealed, with minimal redactions for confidential information regarding the demographics of United employees participating in its 401(k) plan.
179-66	Pl. Ex. 73	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence with attachment bearing the subject line "TDF Updates / questions," dated April 25, 2017, as produced by Defendants at UHG_SNYDER_0036681-84.	The parties agree that this document may be fully unsealed.
179-67	Pl. Ex. 74	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence with attachment bearing the subject line "Document for Tomorrow's Discussion of Target Date Funds," dated November 17, 2016, as produced by Defendants at UHG_SNYDER_0040478-83.	The parties agree that this document may be fully unsealed.
179-68	Pl. Ex. 75	199-37		Email correspondence bearing the subject line "Wells Fargo Executive Briefing Document," dated March 14, 2016, through March 15, 2016, as produced by Defendants at UHG_SNYDER_0031591.	The parties agree that this document may be partially unsealed, with modest redactions for confidential and sensitive information reflecting United's internal assessment of its business relationship with Wells Fargo.

<b>Dkt. No.</b>	<b>Exhibit No.</b>	<b>Dkt. No of Redacted Filing</b>	<b>Nonparty that Designated Document Confidential</b>	<b>Description of Document</b>	<b>Parties' Proposals for Sealing and Unsealing</b>
180-1	Pl. Ex. 76	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "401 Talking Points / Schedule," dated October 11, 2016, as produced by Defendants at UHG_SNYDER_0076683-84.	The parties agree that this document may be fully unsealed.
180-2	Pl. Ex. 77	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence with attachment bearing the subject line "Target Date Fund Overview," dated November 14, 2016, through November 15, 2016, as produced by Defendants at UHG_SNYDER_0042861-63.	The parties agree that this document may be fully unsealed.
180-3	Pl. Ex. 78	N/A (Sealed in Full, see Dkt. No. 183)		UnitedHealth Group Executive Briefing Document, dated March 17, 2017, as produced by Defendants at UHG_SNYDER_0084062-69.	<p>United's internal memoranda describing its relationship with Wells Fargo constitute confidential and competitively sensitive business information relevant to the current and ongoing relationship between Wells Fargo and United.</p> <p>Accordingly, the parties agree that this document should remain sealed in full because it contains confidential and sensitive information reflecting United's internal assessment of its business relationship with Wells Fargo.</p>
180-4	Pl. Ex. 79	N/A (Sealed in Full, see Dkt. No. 183)		UnitedHealth Group Executive Briefing Document, dated January 5, 2018, as produced by Defendants at UHG_SNYDER_0084070-82.	<p>United's internal memoranda describing its relationship with Wells Fargo constitute confidential and competitively sensitive business information relevant to the current and ongoing relationship between Wells Fargo and United.</p> <p>Accordingly, the parties agree that this document should remain sealed in full because it contains confidential and sensitive information reflecting United's internal assessment of its business relationship with Wells Fargo.</p>

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180-5	Pl. Ex. 80	N/A (Sealed in Full, see Dkt. No. 183)		UnitedHealth Group Executive Briefing Document, dated March 2016, as produced by Defendants at UHG_SNYDER_0084055-61.	<p>United's internal memoranda describing its relationship with Wells Fargo constitute confidential and competitively sensitive business information relevant to the current and ongoing relationship between Wells Fargo and United.</p> <p>Accordingly, the parties agree that this document should remain sealed in full because it contains confidential and sensitive information reflecting United's internal assessment of its business relationship with Wells Fargo.</p>
180-6	Pl. Ex. 81	N/A (Sealed in Full, see Dkt. No. 183)		UnitedHealth Group's quarterly relationship summaries for Wells Fargo, dated 2015 to 2021, as produced by Defendants at UHG_SNYDER_0084013-39.	<p>United's internal memoranda describing its relationship with Wells Fargo constitute confidential and competitively sensitive business information relevant to the current and ongoing relationship between Wells Fargo and United.</p> <p>Accordingly, the parties agree that this document should remain sealed in full because it contains confidential and sensitive information reflecting United's internal assessment of its business relationship with Wells Fargo.</p>
180-7	Pl. Ex. 82	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "Wells Fargo," dated January 27, 2016, through January 28, 2016, as produced by Defendants at UHG_SNYDER_0076470-72.	The parties agree that this document may be fully unsealed.
180-8	Pl. Ex. 84	199-38	Wells Fargo	Email correspondence with attachment bearing the subject line "UHG Questions_CC.docx," dated April 24, 2017, as produced by Wells Fargo at WF-00005315-20	The parties agree that this document may be partially unsealed, with minimal redactions for information designated confidential by third party Wells Fargo regarding internal business deliberations.
180-9	Pl. Ex. 85	199-39	Wells Fargo	Email correspondence bearing the subject line "UnitedHealth Group - RFP Fallout," dated January 19, 2018, through January 20, 2018, as produced by Wells Fargo at WF-00031106-07.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Wells Fargo regarding internal business deliberations.

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180-10	Pl. Ex. 86	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "Spending updates for Select companies," dated November 18, 2016, as produced by Defendants at UHG SNYDER 0033473.	The parties agree that this document may be fully unsealed.
180-11	Pl. Ex. 87	199-40		Email correspondence with attachment bearing the subject line "Balance of Trade info," dated November 18, 2016, as produced by Defendants at UHG SNYDER 0076480-81.	The parties agree that the cover email to this document may be unsealed, but that the attachment to this document should be redacted in full because it contains confidential financial information regarding United's business relationships.
180-12	Pl. Ex. 88	N/A (Sealed in Full, see Dkt. No. 183)		Written Action of Executive Vice President, Human Capital of UnitedHealth Group Inc., dated December 2, 2016, as produced by Defendants at UHG SNYDER 0006323-24.	The parties agree that this document may be fully unsealed.
180-13	Pl. Ex. 89	199-41	Wells Fargo	Wells Fargo document entitled "Internal – Client Meeting Preparation Document [/] United HealthGroup Investment Due Diligence," dated March 7, 2018, as produced by Wells Fargo at WF-00002787-89.	The parties agree that this document designated confidential by third party Wells Fargo should be redacted with limited information unsealed, as this document is a confidential relationship summary prepared by Wells Fargo in anticipation of a business meeting with United.
180-14	Pl. Ex. 90	199-42	Wells Fargo	Email correspondence bearing the subject line "It's official – the wait is over! Huge comeback win retaining UHG & \$4B+ in TDF assets," dated June 28, 2017, as produced by Wells Fargo at WF-00032696-97.	The parties agree that this document may be partially unsealed with minimal redactions for personal identifying information.

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180-15	Pl. Ex. 91	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "Target Date Finalist Meetings," dated February 14, 2017, as produced by Defendants at UHG_SNYDER_0034195-99.	The parties agree that this document may be fully unsealed.
180-16	Pl. Ex. 92	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "Investment Committee," dated February 3, 2017, through February 14, 2017, as produced by Defendants at UHG_SNYDER_0076487-88.	The parties agree that this document may be fully unsealed.
180-17	Pl. Ex. 93	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "WF Request," dated March 7, 2017, through March 14, 2017, as produced by Defendants at UHG_SNYDER_0076664-65.	The parties agree that this document may be fully unsealed.
180-18	Pl. Ex. 94	199-43		Email correspondence with attachment bearing the subject line "Final Wells Fargo Materials for Friday 3/24 Steering Committee Meeting," dated March 23, 2017, through March 24, 2017, as produced by Defendants at UHG_SNYDER_0084541-43.	United's internal memoranda describing its relationship with Wells Fargo constitute confidential and competitively sensitive business information relevant to the current and ongoing relationship between Wells Fargo and United.  Accordingly, the parties agree that the cover email may be partially unsealed, with modest redactions for confidential information regarding United's business relationship with Wells Fargo. The parties agree that the attachment should remain sealed in full because it contains confidential and sensitive information reflecting United's internal assessment of its business relationship with Wells Fargo.
180-19	Pl. Ex. 95	199-44	Mercer	Mercer memorandum bearing the subject line "United Health Group Target Date Option," dated August 19, 2015, as produced by Defendants at UHG_SNYDER_0011322-23.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
180-20	Pl. Ex. 96	199-45	Mercer	Mercer memorandum bearing the subject line "Target Date Fund Evaluation," dated June 15, 2016, as produced by Defendants at UHG_SNYDER_0032250-51.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.

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180-21	Pl. Ex. 97	199-46	Mercer	Mercer memorandum bearing the subject line "Conference Call Materials," dated July 26, 2016, as produced by Defendants at UHG_SNYDER_0032993-94.	The parties agree that this document may be partially unsealed, with minimal redactions for personal identifying information.
180-22	Pl. Ex. 98	199-47	Mercer	Mercer memorandum bearing the subject line "Target Date Fund Evaluation," dated August 19, 2016, as produced by Defendants at UHG_SNYDER_0033094.	The parties agree that this document may be partially unsealed, with minimal redactions for personal identifying information.
180-23	Pl. Ex. 99	199-48	Mercer	Email correspondence with attachment bearing the subject line "Target Date Fund Evaluation," dated August 19, 2016, as produced by Defendants at UHG_SNYDER_0033076-93.	The parties agree that this document may be partially unsealed, with minimal redactions for personal identifying information.
180-24	Pl. Ex. 100	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "TDF Historical Returns with Am Funds," dated March 30, 2017, as produced by Defendants at UHG_SNYDER_0035510-11.	The parties agree that this document may be fully unsealed.
180-25	Pl. Ex. 101	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "Just left you a voice mail – quick question," dated April 19, 2017, as produced by Defendants at UHG_SNYDER_0036567-69.	The parties agree that this document may be fully unsealed.
180-26	Pl. Ex. 102	199-49	Wells Fargo	Email correspondence bearing the subject line "UHG Decision Process – No Decision yet & hopefully next week," dated June 23, 2017, as produced by Wells Fargo at WF-00000025-26.	The parties agree that this document may be partially unsealed, with minimal redactions for personal identifying information.
180-27	Pl. Ex. 103	199-50	Wells Fargo	Email correspondence bearing the subject line "UHG visit," dated March 15, 2017, as produced by Wells Fargo at WF-00030612-13.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Wells Fargo regarding internal business deliberations.

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180-28	Pl. Ex. 104	199-51	Wells Fargo	Email correspondence bearing the subject line "Meeting and presentation books," dated March 16, 2017, as produced by Wells Fargo at WF-00017852.	The parties agree that this document may be partially unsealed, with minimal redactions for personal identifying information.
180-29	Pl. Ex. 105	199-52	Wells Fargo	Email correspondence bearing the subject line "Call? Presentation Update," dated March 29, 2017, as produced by Wells Fargo at WF 00005135-36.	The parties agree that this document may be partially unsealed, with minimal redactions for personal identifying information.
180-30	Pl. Ex. 106	199-53	Wells Fargo	Email correspondence bearing the subject line "Presentation materials to be Emailed to UHG tomorrow," dated April 5, 2017, as produced by Wells Fargo at WF-00030621-22.	The parties agree that this document may be partially unsealed, with minimal redactions for personal identifying information.
180-32	Pl. Ex. 109	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence with attachment bearing the subject line "Target Date Finalist Decision," dated May 26, 2017, as produced by Defendants at UHG SNYDER 0037311-13.	The parties agree that this document may be fully unsealed.
180-33	Pl. Ex. 110	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "WF Funds / assessment process," dated May 22, 2017, as produced by Defendants at UHG_SNYDER_0043602-03.	The parties agree that this document may be fully unsealed.
180-34	Pl. Ex. 111	199-55		Email correspondence with attachment bearing the subject line "Target Date Fund Interview Questions," dated April 26, 2017, as produced by Defendants at UHG_SNYDER_0043438-41	The parties agree that this document may be partially unsealed, with minimal redactions for confidential information regarding the demographics of United employees participating in its 401(k) plan.
180-35	Pl. Ex. 112	199-56	Wells Fargo	Email correspondence bearing the subject line "UHG call with Tom McGlinch this morning – recap and to do's," dated May 10, 2017, as produced by Wells Fargo at WF-00030679-80.	The parties agree that this document may be partially unsealed, with minimal redactions for personal identifying information.



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180-36	Pl. Ex. 113	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "Mercer Glide Path / graph," and dated May 17, 2017, through May 18, 2017, as produced by Defendants at UHG SNYDER 0037304-05.	The parties agree that this document may be fully unsealed.
180-37	Pl. Ex. 114	199-57	Wells Fargo	Email correspondence bearing the subject line "UHG & Wells Fargo Conference call at 4:00 Central," dated May 18, 2017, through May 19, 2017, as produced by Wells Fargo at WF-00030833-38.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Wells Fargo regarding investment strategies.
180-38	Pl. Ex. 115	N/A (Sealed in Full, see Dkt. No. 183)		Minutes for Strauss Senior Leader Meeting, dated May 10, 2017, as produced by Defendants at UHG SNYDER 0076740-41.	The parties agree that this document may be fully unsealed.
180-39	Pl. Ex. 116	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "Index Statistics, GPS," dated May 23, 2017, through May 24, 2017, as produced by Defendants at UHG SNYDER 0043604-07.	The parties agree that this document may be fully unsealed.
180-40	Pl. Ex. 117	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "Question," dated May 10, 2023, through May 11, 2017, as produced by Defendants at UHG SNYDER 0043490.	The parties agree that this document may be fully unsealed.
180-41	Pl. Ex. 118	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "Comps of WF v. Vanguard," dated May 17, 2017, as produced by Defendants at UHG SNYDER 0037295-97.	The parties agree that this document may be fully unsealed.
180-42	Pl. Ex. 119	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "Yesterday's call," dated May 18, 2017, as produced by Defendants at UHG SNYDER 0037298-99.	The parties agree that this document may be fully unsealed.
180-43	Pl. Ex. 120	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "Index Statistics, GPS," dated May 23, 2017, through May 26, 2017, as produced by Defendants at UHG SNYDER 0043680-88.	The parties agree that this document may be fully unsealed.

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180-44	Pl. Ex. 121	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "tdf/jr." dated May 29, 2017, as produced by Defendants at UHG SNYDER 0043724.	The parties agree that this document may be fully unsealed.
180-45	Pl. Ex. 122	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "Target Date Fund Provider," dated June 28, 2017, as produced by Defendants at UHG SNYDER 0037412-13.	The parties agree that this document may be fully unsealed.
180-46	Pl. Ex. 123	N/A (Sealed in Full, see Dkt. No. 183)		UnitedHealth Group calendar invitation bearing the subject line "Investment Committee Meeting: Finalize Target Date Fund Firm / Friday, 6/23/17 @ 9:15 AM CT in the 10th Floor Board Room," dated June 23, 2017, as produced by Defendants at UHG SNYDER 0037395.	The parties agree that this document may be fully unsealed.
180-47	Pl. Ex. 124	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "Prototype/ TDF deck," dated June 19, 2017, as produced by Defendants at UHG SNYDER 0040497.	The parties agree that this document may be fully unsealed.
180-48	Pl. Ex. 125	199-58	Mercer	Email correspondence with attachment bearing the subject line "Wells Fargo Custom Glidepath," dated June 12, 2017, as produced by Defendants at UHG SNYDER 0043764-43779	The parties agree that this transcript may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
180-49	Pl. Ex. 126	199-59	Mercer	Email correspondence with attachment bearing the subject line "UnitedHealth Group – TDF Candidate Performance Comparison Summary," dated June 14, 2017, as produced by Defendants at UHG SNYDER 0037362-64.	The parties agree that this document may be partially unsealed, with minimal redactions for personal identifying information.
180-50	Pl. Ex. 127	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence with attachment bearing the subject line "Target Date Fund Decision Making Process," dated August 29, 2017, as produced by Defendants at UHG SNYDER 0053561-64.	The parties agree that this document may be fully unsealed.

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180-51	Pl. Ex. 128	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence with attachment bearing the subject line "Talking Points," dated June 23, 2017, as produced by Defendants at UHG_SNYDER_0040716-18.	The parties agree that this document may be fully unsealed.
180-52	Pl. Ex. 129	199-60	Wells Fargo	Email correspondence bearing the subject line "UnitedHealth Group – RFP Fallout," dated January 19, 2018, as produced by Wells Fargo at WF-00032746-47.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Wells Fargo regarding internal business deliberations.
180-53	Pl. Ex. 130	199-61	Wells Fargo	Email correspondence bearing the subject line "UNH," dated January 19, 2018, through January 23, 2018, as produced by Wells Fargo at WF-00031179-82.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Wells Fargo regarding internal business deliberations.
180-54	Pl. Ex. 131	199-62	Wells Fargo	Email correspondence bearing the subject line "UnitedHealthGroup – RFP Fallout," dated January 19, 2018, as produced by Wells Fargo at WF-00031100-01.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Wells Fargo regarding internal business deliberations.
180-55	Pl. Ex. 132	N/A (Sealed in Full, see Dkt. No. 183)		UnitedHealth Group presentation entitled "Target Date Fund Investment Options: [ ] Historical Search Process and Current Summary," dated February 20, 2019, as produced by Defendants at UHG_SNYDER_0004202-06.	The parties agree that this document may be fully unsealed.
180-56	Pl. Ex. 133	199-63	Mercer	Mercer presentation entitled "UnitedHealth Group [ ] Target Date Fund Discussion," dated February 20, 2019, as produced by Defendants at UHG_SNYDER_004155-201.	The parties agree that this document may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
180-57	Pl. Ex. 134	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "(BN) Wells Fargo Is Said to Discuss Sale of Its Asset-Management," dated October 23, 2020, as produced by Defendants at UHG_SNYDER_0057940-41.	The parties agree that this document may be fully unsealed.

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180-58	Pl. Ex. 135	199-64	Wells Fargo	Email correspondence bearing the subject line "It's official – the wait is over! Huge comeback win retaining UHG & \$4B+ in TDF assets," dated June 28, 2017, as produced by Wells Fargo at WF-00032700-01.	The parties agree that this document may be partially unsealed, with minimal redactions for personal identifying information.
180-59	Pl. Ex. 136	N/A (Sealed in Full, see Dkt. No. 183)		Agreement for Investment in the Wells Fargo Bank, N.A. Collective Investment Funds for Retirement Plans, dated January 3, 2017, as produced by Defendants at UHG SNYDER 0025461-25463.	The parties agree that this document may be fully unsealed.
180-60	Pl. Ex. 137	N/A (Sealed in Full, see Dkt. No. 183)		Meeting minutes of the Board of Directors of UnitedHealth Group, dated August 3, 2010, as produced by Defendants at UHG SNYDER 0024841-44.	The parties agree that this document may be fully unsealed.
180-61	Pl. Ex. 138	N/A (Sealed in Full, see Dkt. No. 183)		Bylaws of the UnitedHealth Group Employee Benefit Plans Investment Committee, dated June 2, 2016, as produced by Defendants at UHG SNYDER 0006296-301	The parties agree that this document may be fully unsealed.
180-62	Pl. Ex. 139	N/A (Sealed in Full, see Dkt. No. 183)		Email correspondence bearing the subject line "Question RE: Investment Committee Meeting Friday, October 14," dated October 10, 2016, as produced by Defendants at UHG_SNYDER_0076476-77	The parties agree that this document may be fully unsealed.
185	Pl. Ex. 22	186		Excerpts from the deposition of Expert Donald Stone, taken on July 20, 2023.	The parties agree that this document may be fully unsealed.
185-1	Pl. Ex. 23	N/A (Sealed in Full, see Dkt. No. 187)		Excerpts from the deposition of Expert David J. Witz, taken on July 25, 2023.	The parties agree that this document may be fully unsealed.
185-2	Pl. Ex. 24	186-1		Excerpts from the deposition of Expert John Minahan, taken on July 26, 2023.	The parties agree that this document may be fully unsealed.

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185-3	Pl. Ex. 51	N/A (Sealed in Full, see Dkt. No. 187)		Excerpts from the deposition of Expert John Chalmers, taken on July 24, 2023.	The parties agree that this document may be fully unsealed.
185-4	Pl. Ex. 108	199-54		Email correspondence with attachment bearing the subject line "United Health Group Custom Glidepath Analysis CC v2 (3). pptx," dated May 22, 2017, as produced by Defendants at UHG_SNYDER_0043598-99.	The parties agree that this document may be partially unsealed, with minimal redactions for confidential information regarding the demographics of United employees participating in its 401(k) plan.
191	Def. EX. 92	190-1		Excerpts from the February 24, 2023 Bruce Monte Deposition Transcript	The parties agree that this document may be fully unsealed.
191-1	Def. EX. 93	190-2		Excerpts from the March 17, 2023 David Strauss Deposition Transcript	The parties agree that this document may be fully unsealed.
191-2	Def. EX. 94	198-21	Mercer	Excerpts from the March 29, 2023 Devon Muir Deposition Transcript	The parties agree that this transcript may be partially unsealed, with modest redactions for information designated confidential by third party Mercer regarding proprietary investment strategies and research.
191-3	Def. EX. 95	N/A (Sealed in Full, see Dkt. No. 192)		Excerpts from the February 15, 2023 Jaime Erickson Deposition Transcript	The parties agree that this document may be fully unsealed.
191-4	Def. EX. 96	N/A (Sealed in Full, see Dkt. No. 192)		Executive Briefing Document, January 2021 (UHG_SNYDER_0084083-90)	United's internal memoranda describing its relationship with Wells Fargo constitute confidential and competitively sensitive business information relevant to the current and ongoing relationship between Wells Fargo and United.  Accordingly, the parties agree that this document should remain sealed in full because it contains confidential and sensitive information reflecting United's internal assessment of its business relationship with Wells Fargo.
191-5	Def. EX. 97	190-3		Excerpts from the March 21, 2023 John Rex Deposition Transcript	The parties agree that this document may be fully unsealed.